

## REMARKS

Claims 16-23 and 25-58 remain in the application for consideration. In view of the following remarks, Applicant respectfully requests allowance of the subject application.

### Teleconference with Examiner

Applicant and the Examiner Ries conducted a teleconference on May 8, 2007. During the teleconference, Applicant and the Examiner Ries discussed the references cited by the Office and the Office's position with respect to the subject claims. Applicant and Examiner agreed that the preferred course of action is for Applicant to substantively respond to the non-final Office Action and, if a final Office Action is then issued, to conduct another teleconference to discuss advancing the prosecution of this application. No other specific agreements or conclusions were made.

Applicant is greatly appreciative of the Examiner's time and willingness to advance prosecution in a meaningful and expeditious manner.

### §102 Rejections based on the Publication

**Claims 16-23 and 25-58** stand rejected under U.S.C. §102(a) as being anticipated by a publication by Chen et al. entitled "Function-Based Object Model Towards Website Adaptation" (hereinafter "Publication").

To overcome the Publication, Applicant submits the attached declaration under 37 CFR §1.132 showing that the Publication describes Applicant's own work as recited in the claims of the subject application. As such, the Publication does not

1 constitute a §102(a) event since it is a publication of Applicant's own invention.  
2 (MPEP §715.01(c), §102(a)).

3 Accordingly, Applicant respectfully requests that the Office withdraw the §  
4 102 rejections of claims 16-23 and 25-58.

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6 **§103 Rejections over Sahota**

7 **Claims 31-42** stand rejected under U.S.C. §103(a) as being unpatentable  
8 over U.S. Patent Publication 2005/0108637 to Sahota et al. (hereinafter "Sahota").

9 Claim 31 recites a web content adaptation method comprising:

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- 11 • receiving multiple web pages that are configured for display on a  
first device type;
  - 12 • processing the multiple web pages to provide multiple different  
objects associated with the webpages, individual objects having one  
13 or more properties relating to functions of the individual object;
  - 14 • applying one or more rules to the objects sufficient to provide  
multiple different webpages that are configured for display on a  
15 second device type that is different from the first device type.

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17 In making out the rejection of claim 31, the Office asserts that its subject  
18 matter would have been obvious in view of the teachings of Sahota. In this regard,  
19 the Office argues that Sahota discloses all the claimed subject matter except for  
20 "receiving multiple web pages that are configured for display on a first device  
21 type". The Office then argues that "it was well known in the art at the time of the  
22 invention that a web browser runs on a personal computer device." The Office  
23 then argues that it would have been obvious to configure web pages to be  
24 displayed on a first device type, such as a personal computer running a web  
25 browser "to create a template of web pages including HTML tags and attributes in

1 order to display text and images for a personal computer display (see Sahota, Page  
2 3, paragraph [0038]).”

3 Applicant respectfully disagrees and submits that the Office has not  
4 established a *prima facie* case of obviousness. Specifically, as Applicant  
5 explained in its last response (November 20, 2006), Sahota merely teaches parsing  
6 an HTML file to create an XML file that can be transformed into a displayable  
7 format by using an extensible style sheet transformation (XSLT) application (see  
8 e.g. Sahota, Fig. 2b and Paragraphs [0064]-[0069]). This XML file is limited to  
9 providing a semantic description of the HTML document – and does not have any  
10 “properties relating to *functions* of the individual object”, as claimed.

11 In response to Applicant’s argument, the Office argues that Sahota teaches  
12 a pattern engine “to provide an abstraction of the services of the design objects”.  
13 (see Office Action, Page 17). In addition, the Office relies on a definition of  
14 “abstraction” from [www.webopedia.com](http://www.webopedia.com).

15 Applicant respectfully disagrees. Indeed, the Office is unclear about what  
16 functionality from Sahota it is even equating with “multiple different objects” as  
17 claimed. For instance, the Office appears to rely on both *design objects* and *easy*  
18 *to use abstraction* from Sahota for this subject matter. However, upon close  
19 inspection, neither of these functionalities discloses or suggests “...individual  
20 objects having one or more properties relating to functions of the individual  
21 object” as claimed.

22 In addition, Applicant fails to see how the definition of “abstraction” from  
23 [www.webopedia.com](http://www.webopedia.com) (which upon close inspection has been mischaracterized as  
24 including “...including functions...” is relevant to what Sahota actually discloses  
25 or suggests.

1           Accordingly, Sahota fails to disclose or suggest all the subject matter of this  
2 claim. Therefore, the Office has not established a *prima facie* case of obviousness  
3 and this claim is therefore allowable.

4           **Claims 32-42** depend from claim 31 and are allowable as depending from  
5 an allowable base claim. These claims are also allowable for their own recited  
6 features which, in combination with those recited in claim 31, are neither disclosed  
7 nor suggested in the reference of record.

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9           **§103 Rejections over Sahota in view of Anderson**

10          **Claims 45-53** stand rejected under U.S.C. §103(a) as being unpatentable  
11 over Sahota in view of U.S. Patent 5,537,526 to Anderson et al. (hereinafter  
12 “Anderson”).

13          **Claim 45** recites a system for adapting web content from one format to  
14 another comprising one or more function-based object models, individual  
15 function-based object models representing objects that are present in a webpage in  
16 terms of one or more of an object’s functional properties.

17          In making out the rejection of claim 45, the Office argues that Sahota  
18 discloses a system for adapting web content from one format to another including  
19 one or more object models ... However, the Office acknowledges that Sahota  
20 does not disclose one or more objects that are function based. Instead, for this  
21 missing subject matter the Office relies on the Model Command Objects in  
22 Anderson and argues that it would have been obvious to combine the teachings of  
23 Anderson with Sahota “to allow a user to incrementally modify a model, thus  
24 making it easier to undo or redo commands, to obtain the invention as specified in  
25 claim 45.”

1 Applicant respectfully disagrees and submits that the Office has not  
2 established a *prima facie* case of obviousness. Specifically, Applicant is unable  
3 to find any mention of function-based object models in Sahota. In addition, the  
4 Model Command Objects in Anderson encapsulate a user command which allows  
5 a user to incrementally modify a document. Applicant fails to see how this  
6 discloses "one or more function-based object models" or "individual function-  
7 based object models representing objects that are present in a webpage in terms of  
8 one or more of an object's functional properties." As such, Applicant can only  
9 conclude that neither Sahota nor Anderson, together or in combination, disclose or  
10 suggest all the subject matter of this claim.

11 Furthermore, The Office's stated motivation does not appear to even be  
12 relevant because Sahota provides a means by which a user can create files or  
13 documents. (e.g., see Sahota Paragraph [0026]). This includes a remote controller  
14 with which a user can access and navigate through set-top browser on a TV by  
15 pressing selectively certain buttons or keys on remote controller. (e.g., see Sahota  
16 Paragraph [0037]). As such, it remains unclear why one would have been  
17 motivated to combine Sahota with Anderson to allow a user to modify a model.

18 Accordingly, for the reasons given above, the Office has not established a  
19 *prima facie* case of obviousness and this claim is therefore allowable.

20 **Claims 46-53** depend from claim 45 and are allowable as depending from  
21 an allowable base claim. These claims are also allowable for their own recited  
22 features which, in combination with those recited in claim 45, are neither disclosed  
23 nor suggested in the reference of record.  
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1        **Conclusion**

2        All of the claims are in condition for allowance. Applicant respectfully  
3 requests a Notice of Allowability be issued forthwith. If the Office's next  
4 anticipated action is to be anything other than issuance of a Notice of Allowability,  
5 Applicant respectfully requests a telephone call for the purpose of scheduling an  
6 interview.

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9        Dated: 7/31/07

Respectfully Submitted,

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